From:

"Gary Swayne" <PapaGary48@comcast.net>

To:

<commentletters@waterboards.ca.gov>

Date:

Sat, Jun 9, 2007 1:05 AM

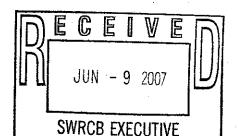
Subject:

Comment Letter - Suction Dredge Mining

State Water Resources Control Board
Division of Water Quality
P.O. Box 100 Sacramento, California 95812-0100
Fax: 916-341-5620 email: commentletters@waterboards.ca.gov

9 June 2007

Dear Sirs.



5/12/07 Workshop Suction Dredge Mining Deadline: 6/22/07 Noon

I have been into recreational mining still before 1990, so you can tell I'm still learning about all the types and techniques of mining. I have been operating a suction dredge from about 1992. In the beginning of my use with a dredge, I was worried about the effect of what I was doing with the dredge and how it was effecting the stream and the wild life. I have researched the use to a point of where I believe that there no long lasting effect on or to the river or wild life that are a part of the system of the river. I have seen where we have dredged for a time and than filled in our dredge hole one year and came back and not been able to see or tell exactly where we had been, without knowing (having taken pictures of what we were doing at the time) that someone had worked the area before.

I have had fish of all sizes come into the area we were working, right up to my face mask and all around the equipment that we were using at the time. I have seen the time when we had to work around boulders that were so big we could not move them, so we just left them where they were. Than coming back the next year to find that the river had flooded so high and hard that these same "rocks" were one, two, three hundred feet and sometimes yards down the river from where we had been the year before. I know if we worked all year long at these places we would not be able to have move this amount of river bed material. I would like to end with this, if you have never been around or have operated one of these recreational dredges, you should take a little time and go see for yourself and I'm sure just by seeing what goes on with one or two of these dredges in operation you will get a better idea of what I'm trying to tell you.

Thank you for your time and attention,

Gary L. Swayne

22910 Road 130

Tulare, California

93274-4733

Here are some of the parts of studies and reports I have looked at to see if there are any harming effect from suction dredging.

It has been suggested that a single operating suction dredge may not pose a problem but the operation of multiple dredges would produce a cumulative effect that could cause harm to aquatic organisms. However, "No additive effects were detected on the Yuba River from 40 active dredges on a 6.8 mile (11 km) stretch. The area most impacted was from the dredge to about 98 feet (30 meters) downstream, for most turbidity and settelable solids (Harvey, B.C., K. McCleneghan, J.D. Linn, and C.L. Langley, 1982).

"Suction dredges, powered by internal combustion engines of various sizes, operate while floating on the surface of streams and rivers. As such, oil and gas may leak or spill onto the water's surface. There have not been any observed or reported cases of harm to plant or wildlife as a result of oil or gas spills associated with suction dredging" (CDFG, 1997).

"Effects from elevated levels of turbidity and suspended sediment normally associated with suction dredging as regulated in the past in California appear to be less than significant with regard to impacts to fish and other river resources because of the level of turbidity created and the short distance downstream of a suction dredge where turbidity levels return to normal" (CDFG, 1997).

Solar radiation is the single most important energy source for the heating of streams during daytime conditions. The loss or removal of riparian vegetation can increase solar radiation input to a stream increasing stream temperature. Suction dredge operations are confined to the existing stream channel and do not affect riparian vegetation or stream shade (SNF, 2001).

CC:

"Gary Swayne" <PapaGary48@comcast.net>